

Class VI UIC Information Request

This submission is for:

Project ID: R06-LA-0004

Project Name: YAMS CO2 Sequestration Project

Current Project Phase: Pre-Injection Prior to Construction

Request #1

1. Information request document [permitting authority]

https://epa.velo.pnnl.gov/alfresco/service/velo/getFile/no_wiki/shared/Submissions/R06-LA-0004/Phase1-PreConstruction/InfoReq-Notify-09-07-2021-1349/Oxy--Information--Request--Letter.pdf

2. Topic(s) or subject(s) of information request [permitting authority]

Site Characterization

Other (specify): Aformentioned issues are present throughout the submission

3. Response due date [permitting authority]
4. Are you submitting a new or updated response to this information request? [permit applicant/owner or operator]
5. Response document [permit applicant/owner or operator]
6. Are you submitting references or other supplemental materials? [permit applicant/owner or operator]

Send Request

Comments regarding this notification: Hi there Kelly, Please do not hesitate to reach out to myself and our team regarding our comments. All the best, Brody P Friesenhahn

The notification including a read-only copy of the request will be emailed to: Kelly_Watson@oxy.com

Good afternoon Kelly,

We wanted to touch base regarding a few areas that need attention in the current Oxy Low Carbon Ventures, LLC. Class VI permit application submitted to EPA Region 6. Region 6 strongly encourages the use of crosswalks provided by EPA to ensure that all required data is included and able to be located during application review. It is also important that figures and maps are provided in a format where quality is maintained and legible to ensure that detailed information is accessible to Region 6.

To highlight, in general terms, some of the issues that appear:

- Missing data that is required for proper site characterization
 - For example: no detailed stratigraphic columns are provided for the project area.
- Insufficient detail to technically approve the material
 - For example: Lacking proper cross sections, isopach maps and regional maps (including facility boundaries).
- Illegible maps and figures prohibit a proper review of the application
 - For example: Figure AOR-17 is not legible. This issue is found throughout the submission.
- Missing required GSDT modules
 - Refer to document entitled “Module Phases” for information regarding required modules.

Our review team suggests that Oxy Low Carbon Ventures, LLC. conduct a thorough review of submitted data and make necessary adjustments in accordance with the pervasive issues outlined above and found throughout the current application submittal. If more guidance is needed, Region 6 encourages applicants to refer to the provided crosswalks.

All the best,

Brody P. Friesenhahn

Geologist

U.S. EPA, Region 6 (Groundwater/UIC)

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